

MEMO ENDORSED

LUIS SANCHEZ
#56930-054
USP Beaumont.
P.O. Box 2603
Beaumont, TX. 77702

Sept 10, 2021

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/22/21

ATT: Clerk of Court
500 Pearl St.
New York, NY 10007

Dear Clerk,

Please find enclosed a pleading I would like to file with the Court. Please convey my apologies to the Court for the hand written nature. However, under the circumstance it was the best we could produce. Thank-you for your time and assistance in this matter and all matters considered.

Best Regards,



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LUIS SANCHEZ,
Defendant.

- VS -

04-CR-36 (Vec)

UNITED STATES OF America,
Respondent.

Defendant's Motion For LEAVE TO Supplement His previous Motion The Court Construed As A Motion For A Compassionate Release And Supplement to Motion For Compassionate Release

Comes now, Mr. Luis Sanchez, the "Defendant" pro se, with the assistance of an inmate paralegal i.e., Ricky Denton," and respectfully Moves the Court for leave to Supplement what the Court Construed as a Motion for

1/ Defendant apologizes for the handwritten pleading. However, Due to COVID-19 restrictions it's the best he can produce. Furthermore, respectfully begs the Court and all parties indulgence.

Compassionate Release. Furthermore, incorporates a supplement of a newly developed extraordinary and Compelling reason to grant Defendant a Compassionate release.

Supplemental Facts

Subsequent to Defendant filing the Motion for Compassionate release, Defendant's sister died. Most importantly, Defendant's sister had two small children with no one to care for them. The only possible available care giver would be Defendant's elderly mother, but she needs care for herself. In other words, Defendant is the primary care giver for these two young children. A fact that constitutes an extraordinary and Compelling reason.

Defendant incorporates a Motion to be granted 30 days to obtain and present documents of this event to the Court. Thus, as the Court has ordered the government to respond it may be the case the Court would consider entering an administrative order extending or amending the Court's order

In regard to the government responding.

Whereas: Defendant Prays the Court after Considering
the above will grant Defendant the requested Relief
and for any and all relief the Court Deems equitable.
in the interest of Justice.

Respectfully Submitted on 9/10/2021



LUIS SANCHEZ # 56930-054

P.O. Box 26035

Beaumont, TX. 77720

Certificate of Service

I, Luis Sanchez hereby certify that I have served a true and correct copy of the following:

motion to Supplement Compassionate Release Motion

which is deemed filed at the time it was delivered to prison authorities for forwarding [Houston v. Lack 101 L.Ed.2d 245 (1988)] upon the defendant(s) and or his/her attorney(s) of record by placing same in a sealed, postage prepaid envelope addressed to:

*John Jay O'Donnell Jr.
U.S. Attorney's Office SDNY
One St. Andrew's Plaza
New York, NY 10007*

and by depositing same in the United States Mail at the United State Penitentiary, Beaumont on this 10 day of Sept 2021

Luis Sanchez

(Name)

P.O. Box 26030

(Address)

Beaumont, TX 77720

(City, State, Zip)

Application GRANTED. Defendant must submit supplemental materials no later than **October 20, 2021**. The Government is ordered to respond to Mr. Sanchez's motion, including his supplemental materials, no later than **November 3, 2021**. The Government must still include with its response a copy of Mr. Sanchez's medical records for the past two years, to be filed under seal, and a copy of Mr. Sanchez's disciplinary records and educational records, filed on the public docket. Mr. Sanchez may reply in further support of his motion not later than **November 24, 2021**. The Clerk of Court is respectfully directed to mail a copy of this order to Mr. Sanchez.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over the typed name.

9/22/21

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE